

recording images under a second type of illumination;

iv) Riconda shows no illuminator at all in its camera compartment, and no problem (caused by such compact placement) of interior reflection from a pane for the camera;

v) the problem of light "leakage" as presented in Riconda (para. 090) has to do with increasing the amount of light leaving the forward face, rather than leaking into the camera compartment through walls 1126 or 1127, where presumably, the camera would; block some of it;

vi) the problem of light reflection off a camera pane is not even presented, let alone solved in Riconda, because it has no illuminator in the camera compartment, but rather has a remote light source that is channelled around the camera compartment, a situation that is totally different from the dual illuminator, dual compartment, compact dual camera surveillance system of the present invention.

2. In any event, considering making a system like Riconda's but with "two different illumination sources where the camera(s) are shielded from the illumination sources" (as set out in the objection re obviousness at the bottom of the OA page 3 by the Examiner) would not result in the system claimed in the present Claims 1 – 3, and 8 – 11, because:

i) merely having two systems such as shown in Riconda's Figure 11, one with an infrared illuminator and a second with a visible light illuminator, for example, would only yield a

dual bulky system in which each type of illumination is channelled around its respective camera;

ii) it would be an inventive leap quite far from Riconda's system(s) to come up with the compacting and effective solution of having the respective cameras compartmentalized with the "wrong" (opposite) illuminator in the respective compartments.

iii) Riconda has nothing to do with teaching the prevention of reflection of the applicable kind of illumination from a translucent pane for a camera sensitive to that illumination.

The present system would thus not seem obvious to a person skilled in the art upon reading Riconda.

3. Regarding Claims 4, and 7, it is respectfully submitted they are allowable as incorporating by reference the elements of Claim 1, which defines an invention neither taught nor obvious by Riconda in light of the considerations noted above.

4. Furthermore, the Bauer patent shows baffles between the LEDs and the camera to prevent feedback glare, but does not provide a means of preventing that feedback glare when an illuminator is alongside the camera with no baffle.

5. With regard to miniaturization, Bauer's sentences at col. 15, lines 4 - 8:

"As mentioned above, a camera/light assembly may be mounted in the tail light assembly 308 of a vehicle. FIGS. 13 and 14 show the possible construction of such an assembly 500. Assembly 500 preferably includes a support structure 502 and a lens 504 that together provide a housing for the integrated lights and camera system. A first light 180 is provided in an upper portion of assembly 500 that includes an array of red or red-orange LEDs 506 mounted to a circuit board 363. First light 180 is preferably controlled in such a manner so as to function as the brake lights, turn signal lights, and running lights of the vehicle."

relate only to the possibility of mounting his system in what is a relatively small space, but neither speaks of nor discloses a means of miniaturizing and compacting such as the present invention does.

6. With regard to the Examiner's rejections of Claims 5, 6, 13, and 14, it is respectfully submitted they are allowable as based by reference on Claim 1, which defines an invention neither taught nor obvious by Riconda in light of the considerations first noted above.

7. Furthermore, attaching heat sinks to a cabinet as in the Sarajii cite is a mere add-on combination, whereas the present invention variation in which the compartments have cooling fins as disclosed and claimed integrates with the compactness permitted by the dual surveillance camera, dual illuminator, dual compartment arrangement earlier claimed.

8. The Applicant notes that a corresponding application has resulted in a patent in Canada (2,438,939) as claimed.

9. The applicant respectfully submits that the Riconda prior art cited in the present application against Claim 1 makes disclosures that take a person skilled in the art no closer to deriving the present invention as that person would already have the common knowledge in photography that it is useful to have an illuminator project its light around and parallel to a camera's outlook, and that knowledge does not give rise to the innovation claimed herein.

#### AMENDMENT

10. Claim 13 has been amended to end with a period.

#### SUMMARY

It is therefore respectfully submitted that the enclosed Claim 1 and its dependent Claims 2 – 11, 13, and 14 would be allowable as well as the otherwise allowable Claim 12 and Claim 15.

Applicant

